C11-01492 FDE/cml

## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION - CLEVELAND

	)
IN RE:	) CHAPTER 7
Cynthia R. Sims	) CASE NO. 11-14342
Debtor	) JUDGE Arthur I Harris
	)
	)

#### NOTICE OF MOTION FOR RELIEF FROM STAY AND ABANDONMENT

PROPERTY: 2005 Dodge Durango, VIN#1D4HB48NX5F569224

AmeriCredit Financial Services Inc, has filed papers with the Court for Relief from the Automatic Stay and Abandonment in this bankruptcy case.

Your Rights May Be Affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant relief from the automatic stay, or if you want the Court to consider your views on the Motion, then on or before **September 20, 2011**, you or your attorney must:

File with the Court a brief written statement of reasons in opposition to the Motion, a list of authorities upon which

respondent relies, and, if appropriate, copies of all documentary evidence which respondent intends to submit in opposition to the Motion in addition to the Affidavits required or permitted by the Federal Rules of Civil Procedure, at:

Clerk of Courts
United States Bankruptcy Court
Howard M. Metzenbaum Court House
201 Superior Avenue
Cleveland, OH 44114

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. You must also mail a copy to:

REIMER, ARNOVITZ, CHERNEK & JEFFREY CO., L.P.A. 2450 Edison Blvd., Twinsburg, OH 44087 Cynthia A. Jeffrey, Esq. Faye D. English, Esq.

Attend the hearing scheduled to be held on **September 27**, **2011** at **10:00 a.m**. in courtroom #1A at Cleveland, Howard M. Metzenbaum Court House 201 Superior Avenue, Cleveland, OH, 44114.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Date: August 19, 2011

# /s/ Cynthia A. Jeffrey

REIMER, ARNOVITZ, CHERNEK &

JEFFREY CO., L.P.A.

BY: Cynthia A. Jeffrey #0062718

BY: Faye D. English #0075557

P.O. Box 968

Twinsburg, Ohio 44087

Phone: 330-425-4201

Fax: 330-425-2155

Attorneys for Movant

### CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on August 19, 2011 copies of the foregoing Notice authorizing Abandonment and Relief from Stay were served on the following registered CM/ECF participants, electronically through the Court's transmission facilities at their email addresses listed on the COURTS ELECTRONIC MAIL NOTICE LIST.

- 1. Office of the U.S. Trustee
  Served via: (registered address)@usdoj.gov
- 2. Steven Davis, Trustee
   Served via: sdavis@epitrustee.com
- 3. Jon Ginter, Esq.
   Served via: mresar@ohiolegalclinic.com

I hereby certify that the following were served by mailing on August 19, 2011 the same by ordinary U.S. mail, postage prepaid, to the persons listed below:

1. Cynthia R. Sims, Debtor 260 E. 216th St. Euclid, OH 44123

### /s/ Cynthia A. Jeffrey

REIMER, ARNOVITZ, CHERNEK &

JEFFREY CO., L.P.A.

BY: Cynthia A. Jeffrey #0062718

BY: Faye D. English #0075557

P.O. Box 968

Twinsburg, Ohio 44087

Phone: 330-425-4201

Fax: 330-425-2155

Attorneys for Movant